

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RANDALL HIX,

Plaintiff(s),

vs.

BIOMET, INC., et al.

Defendant(s).

Case # 3:18-cv-00437-RCJ-WGC

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

Navan Ward, Jr., Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.

(firm name)

with offices at Overlook II, 2839 Paces Ferry Road SE, Suite 400,

(street address)

Atlanta,

(city)

Georgia,

(state)

30339,

(zip code)

(800) 898-2034,

(area code + telephone number)

Navan.Ward@BeasleyAllen.com

(Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

Randall Hix

[client(s)]

to provide legal representation in connection with

the above-entitled case now pending before this Court.

3. That since 09/27/2002, Petitioner has been and presently is a
(date)
member in good standing of the bar of the highest Court of the State of Alabama
(state)
where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
from the clerk of the supreme court or highest admitting court of each state, territory, or insular
possession of the United States in which the applicant has been admitted to practice law certifying
the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District
Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
of other States on the dates indicated for each, and that Petitioner is presently a member in good
standing of the bars of said Courts.

Court	Date Admitted	Bar Number
USDC - AL (Middle & Northern Districts)	10/16/2002	9527-A57W
USDC - AL (Southern District)	12/2/2002	9527-A57W
USDC - MS (Northern & Southern Districts)	4/29/2003	100921
New York	7/15/2016	5451755
Tennessee	11/4/2016	34931
Mississippi	04/23/2003	100921
Alabama	09/27/2002	ASB-9527-A57W

5. That there are or have been no disciplinary proceedings instituted against petitioner,
nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
or administrative body, or any resignation or termination in order to avoid disciplinary or
disbarment proceedings, except as described in detail below:

(State "none" if Petitioner has no disciplinary proceedings, etc.) None

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

(State "none" if Petitioner has never been denied admission.) None

7. That Petitioner is a member of good standing in the following Bar Associations.

(State "none" if Petitioner is not a member of other Bar Associations.) Alabama, Mississippi, Tennessee, and New York

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
None			

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
FOR THE PURPOSES OF THIS CASE ONLY.

Navan Ward Jr.

Petitioner's signature

STATE OF Georgia)
COUNTY OF Cobb)

Navan Ward, Jr., Petitioner, being first duly sworn, deposes and says:
That the foregoing statements are true.

Navan Ward Jr.

Petitioner's signature

Subscribed and sworn to before me this

29th day of June, 2020

Darnesia Whitfield

Notary Public or Clerk of Court



**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
believes it to be in the best interests of the client(s) to designate Peter C. Wetherall,
(name of local counsel)
Attorney at Law, member of the State of Nevada and previously admitted to practice before the
above-entitled Court as associate resident counsel in this action. The address and email address of
said designated Nevada counsel is:

9345 West Sunset Road, Suite 100
(street address)


Las Vegas, Nevada, 89148
(city) (state) (zip code)

(702) 838-8500, pwetherall@wetherallgroup.com
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.
4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6
7 The undersigned party(ies) appoint(s) Peter C. Wetherall as
(name of local counsel)
8 his/her/their Designated Resident Nevada Counsel in this case.

9
10 
(party's signature)

11 Randall Hix

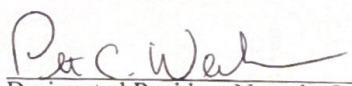
12 (type or print party name, title)

13
14 (party's signature)

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16 (type or print party name, title)

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

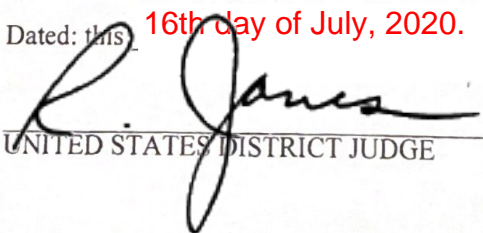
19
20 
Designated Resident Nevada Counsel's signature

21 4414
Bar number

pwetherall@wetherallgroup.com
Email address

23 APPROVED:

24 Dated: this 16th day of July, 2020.

25
26 
27 UNITED STATES DISTRICT JUDGE
28

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF ALABAMA

OFFICE OF THE CLERK

ONE CHURCH STREET

MONTGOMERY, ALABAMA 36104-4018

DEBRA P. HACKETT
CLERK

TELEPHONE
(334) 954-3600

CERTIFICATE OF GOOD STANDING

I, **DEBRA P. HACKETT**, Clerk of the United States District Court, Middle District of Alabama,

DO HEREBY CERTIFY that **NAVAN WARD JR.** was duly admitted to practice in said Court on **OCTOBER 16, 2002** and is in good standing as a member of the bar of said Court.

Dated at Montgomery, Alabama, on April 15, 2020.



DEBRA P. HACKETT, CLERK

By: _____


Deputy Clerk

The Supreme Court of Mississippi



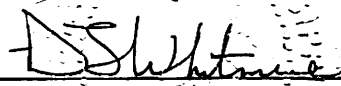
Certificate of Good Standing

*I, D. Jeremy Whitmire, as Clerk of the Supreme Court of Mississippi, do hereby certify that **Navan Ward, Jr.** was duly and legally admitted to practice law before the Supreme Court of Mississippi on April 29, 2003, and is now an attorney in good standing of the Bar of this Court, as shown by the records of said Court on file in this office.*

I further certify that the Supreme Court of Mississippi is the highest court of record in this state.

Done on April 17, 2020, with the seal of the Supreme Court of Mississippi affixed.

The Supreme Court of Mississippi


CLERK





State of New York
Supreme Court, Appellate Division
Third Judicial Department

I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Navan Ward Jr.

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 15th day of July, 2016, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 20th day of April, 2020.

Robert D Mayberger

Clerk



Supreme Court of Tennessee
Certificate of Good Standing

*I, James M. Hivner, Clerk of the Supreme Court of the State of Tennessee,
do hereby certify that*

Navan Ward, Jr.

*is a licensed and practicing attorney of the Courts of this State, having been
admitted to practice on November 4, 2016, and is presently in good standing. The
Supreme Court is the Court of last resort in Tennessee.*

*In testimony whereof, I have set my hand and affixed the seal of the Court on
this the 20th day of April, 2020.*

James M. Hivner

Clerk of the Supreme Court of Tennessee

By: 

MB Lindsey
MaryBeth Lindsey, D.C.